

1 **BOIES SCHILLER FLEXNER LLP**
2 David Boies (admitted *pro hac vice*)
3 333 Main Street
4 Armonk, NY 10504
5 Tel: (914) 749-8200
6 dboies@bsfllp.com
7 Mark C. Mao, CA Bar No. 236165
8 Beko Reblitz-Richardson, CA Bar No. 238027
9 Erika Nyborg-Burch, CA Bar No. 342125
10 44 Montgomery St., 41st Floor
11 San Francisco, CA 94104
12 Tel.: (415) 293-6800
13 mmao@bsfllp.com
14 brichardson@bsfllp.com
15 enyborg-burch@bsfllp.com
16 James Lee (admitted *pro hac vice*)
17 Rossana Baeza (admitted *pro hac vice*)
18 100 SE 2nd St., 28th Floor
19 Miami, FL 33131
20 Tel.: (305) 539-8400
21 jlee@bsfllp.com
22 rbaeza@bsfllp.com
23 Alison L. Anderson, CA Bar No. 275334
24 725 S Figueroa St., 31st Floor
25 Los Angeles, CA 90017
26 Tel.: (213) 995-5720
27 alanderson@bsfllp.com

1 **SUSMAN GODFREY L.L.P.**
2 William C. Carmody (admitted *pro hac vice*)
3 Shawn J. Rabin (admitted *pro hac vice*)
4 Steven M. Shepard (admitted *pro hac vice*)
5 Alexander Frawley (admitted *pro hac vice*)
6 1301 Avenue of the Americas, 32nd Floor
7 New York, NY 10019
8 Tel.: (212) 336-8330
9 bcarmody@susmangodfrey.com
10 srabin@susmangodfrey.com
11 sshepard@susmangodfrey.com
12 afrawley@susmangodfrey.com
13 Amanda K. Bonn, CA Bar No. 270891
14 1900 Avenue of the Stars, Suite 1400
15 Los Angeles, CA 90067
16 Tel.: (310) 789-3100
17 abonn@susmangodfrey.com
18 **MORGAN & MORGAN**
19 John A. Yanchunis (admitted *pro hac vice*)
20 Ryan J. McGee (admitted *pro hac vice*)
21 201 N. Franklin Street, 7th Floor
22 Tampa, FL 33602
23 Tel.: (813) 223-5505
24 jyanchunis@forthepeople.com
25 rmcgee@forthepeople.com
26 Michael F. Ram, CA Bar No. 104805
27 711 Van Ness Ave, Suite 500
28 San Francisco, CA 94102
29 Tel: (415) 358-6913
30 mram@forthepeople.com

20 **UNITED STATES DISTRICT COURT**
21 **NORTHERN DISTRICT OF CALIFORNIA**

22 CHASOM BROWN, WILLIAM BYATT,
23 JEREMY DAVIS, CHRISTOPHER
24 CASTILLO, and MONIQUE TRUJILLO
25 individually and on behalf of all similarly
26 situated,

27 Plaintiffs,

28 vs.

29 GOOGLE LLC,

30 Defendant.

Case No.: 4:20-cv-03664-YGR-SVK

31 **DECLARATION OF MICHAEL J.
32 LASINSKI IN SUPPORT OF
33 PLAINTIFFS' MOTION FOR CLASS
34 CERTIFICATION**

35 Judge: Hon. Yvonne Gonzalez Rogers
36 Date: September 20, 2022
37 Time: 2:00 p.m.
38 Location: Courtroom 1 – 4th Floor

1 **DECLARATION OF MICHAEL J. LASINSKI**

2 I, Michael J. Lasinski, declare:

3 1. Counsel for the *Brown* Plaintiffs retained me to provide expert analysis and, if
4 requested, expert testimony, in the *Brown* matter. I have personal knowledge of the matters set
5 forth herein and am competent to testify.

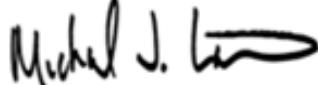
6 2. I submit this declaration in connection with Plaintiffs' Motion for Class
7 Certification.

8 3. Attached is a true and correct copy of the Expert Report that I prepared in
9 connection with this matter. The opinions I provided therein are true and correct to the best of
10 my knowledge.

11

12 I declare under penalty of perjury under the laws of the United States of America that the foregoing is
13 true and correct. Executed this 17th day of June, 2022, at 215 E. Washington St., Suite 201, Ann
14 Arbor, MI 48104.

15

16 _____
17 /s/ 
18

19

20

21

22

23

24

25

26

27

28

Michael Lasinski
4.22.2022 Expert Report and all
Appendices
(Plaintiffs)

[Document Filed Under Seal]